

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re:

SCHUYLKILL RAIL CAR, INC.,
Debtor in Possession

Chapter 11

Case No. 1:14-bk-02477-RNO

v.

GILMOUR CONSULTING, LLC,
PLAN ADMINISTRATOR,
Movant

v.

FIRST NATIONAL BANK OF
PENNSYLVANIA, ET. AL.,
AMERICAN EAGLE, PAPER MILLS,
ALLEGHENY VALLEY RAILROAD
COMPANY, BUFFALO AND PITTSBURGH
RAILROAD, CAMP CHASE , INDUSTRIAL
RAILROAD CORP., CANDO RAIL
SERVICES, LTD., EDWARDS AND ROSE
COTTONSEED, L.P. D/B/A CAPE AND SON,
CATERPARROTT RAILNET, CENTRAL
MAINE AND QUEBEC US RAILWAY, INC.,
COMBINED METAL INDUSTRIES INC., CSX
TRANSPORTATION INC., CANTON ,
RAILROAD CO., DELAWARE-,
LACKAWANNA RAILROAD CO., INC.,
DEPEW, LANCASTER AND WESTERN ,
RAILROAD CO., INC., HAPPY VALLEY
BLENDING LLC, FINGER LAKES
RAILWAY CORP., HOUSATONIC
RAILROAD CO., INC., INTERSTATE ,
COMMODITIES, INC., INTERSTATE
INDUSTRIAL SANDS, LLC, JUNIATA
VALLEY RAILROAD, KOPPERS, INC.,
LYCOMING VALLEY RAILROAD, MITTAL
STEEL USA-RAILWAYS, INC., NITTANY
AND BALD EAGLE RAILROAD, NORFOLK
SOUTHERN CORPORATION, HOOSIER
MAGNETICS, INC., OWEGO AND
HARTFORD RAILWAY, INC., POTTERS
INDUSTRIES, LLC, RAILWORKS
MAINTENANCE OF WAY, INC., REIST

POPCORN CO., DEL MONTE FOODS, INC.,
SAGER CREEK , FOODS, INC., STEELTON
AND HIGHSPIRE RAILROAD CO., THE J.M.
SMUCKER CO., YOUNGSTOWN AND
SOUTHEASTERN RAILROAD, LEESPORT
BANK, VIST BANK, TOMPKINS VIST
BANK, LAWRENCE V. YOUNG, ESQ., CGA
LAW FIRM, ALEX EVERHART, ROBERT L.
KNUPP, ESQUIRE, INTERNAL REVENUE
SERVICE, PENNSYLVANIA ,
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Respondents

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LIMITED OBJECTION TO PLAN ADMINISTRATOR'S
JOINT MOTION TO SELL PERSONAL PROPERTY
FREE AND CLEAR OF ALL LIENS, CLAIMS, INTERESTS AND ENCUMBRANCES

COMES NOW, this 9th day of June, 2017, Lawrence V. Young, Esquire, Counsel of Record for the Debtors in Possession, Schuylkill Rail Car, Inc. and D&D Rail Car, Inc., by and through his Counsel, CGA Law Firm, Lawrence V. Young, Esquire, and does file the within Limited Objection as follows:

Counsel for the Debtors in Possession does not object to the sale of Debtors' assets nor to the methodology of said sale. However, Counsel for Debtors believes that funds sufficient to pay the previously-approved professional fees that are the subject of the pending Adversary Complaints filed at Case No. 1:17-ap-00025, 1:17-ap-00026 and 1:17-ap-00027 should be escrowed from the sale proceeds in the event that said Adversary Complaints are successful.

WHEREFORE, Counsel for Debtor respectfully requests that this Honorable Court enter an Order approving the Plan Administrator's Joint Motion to Sell Personal Property Free and

Clear of All Liens, Claims, Interests and Encumbrances subject to the limitation that the Plan Administrator be directed to escrow funds sufficient to pay the previously approved professional fees that are subject of the pending Adversary Complaints filed at Case No. 1:17-ap-00025, 1:17-ap-00026 and 1:17-ap-00027.

Respectfully submitted,

CGA Law Firm

/s/Lawrence V. Young, Esquire

Lawrence V. Young, Esquire

Sup. Ct. I.D. No. 21009

135 North George Street

York, PA 17401

(717) 848-4900

Counsel for Debtor in Possession

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CERTIFICATE OF SERVICE

I certify that I am more than 18 years of age and that on June 9, 2017, a true and correct copy of the attached Limited Objection was served upon the following parties in the following manner:

Name	Mode of Service
Office of the United States Trustee	Via CM/ECF
Heather Z. Kelly, Esquire	Via CM/ECF
Peter S. Russ, Esquire	Via CM/ECF
Edward C. Toole, Jr., Esquire	Via CM/ECF
Eric L Brossman, Esquire	Via CM/ECF
Jeffrey D. Cohen, Esquire	Via CM/ECF
Timothy L. Frey, Esquire	Via CM/ECF
Robert L. Knupp, Esquire	Via CM/ECF
Iles Cooper, Esquire	Via CM/ECF
Adam Gordon Klein, Esquire	Via CM/ECF
Thomas I. Puleo, Esquire	Via CM/ECF
Markian R. Slobodian, Esquire	Via CM/ECF
John Brian Joyce, Esquire	Via CM/ECF

I certify under penalty of perjury that the forgoing is true and correct.

Date: 06/09/2017

/s/Lawrence V. Young, Esquire
Lawrence V. Young, Esquire